

From: Marsh, Karen
Sent: Thursday, April 25, 2019 03:19 PM
To: Witosky, Matthew
CC: Mia, Marcia
Subject: RE: More OOOOa/MACT HH questions

Yes, please draft.

For LDAR, OOOO points to 60.480a (VVa) which is more stringent than KKK and is also included in OOOOa. No changes were made between OOOO and OOOOa on LDAR.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Karen R. Marsh, PE

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Witosky, Matthew
Sent: Thursday, April 25, 2019 10:51 AM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Cc: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: More OOOOa/MACT HH questions

Ex. 5 Deliberative Process (DP)

One, yes, HH only creates exclusions for affected facilities covered by OOOO, because they were drafted together. OOOOa did not exist when HH was finalized, and HH has yet to be revised under reconsideration.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

But the provisions for 40 CFR 60.5385a are not overlapping leak provisions. The 40 CFR 60.5385a are about rod packing replacement for reciprocating compressors at processing plants, which is a distinct standard from LDAR standards. HH does not at all cover such provisions, so even when we revise HH for reconsideration, that revision won't affect applicability of 60.5385a for compressors at processing plants.

The provisions in HH applicable to compressors at processing plants are LDAR provisions in 63.769. And 63.769(b) does exempt sources subject to 0000, **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

Do you want me to draft a response for you to look at?

Cheers

Matt

From: Marsh, Karen
Sent: Thursday, April 25, 2019 7:40 AM
To: Witosky, Matthew <Witosky.Matthew@epa.gov>
Subject: FW: More 0000a/MACT HH questions

Matt,

What do you think?

Karen R. Marsh, PE
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From: Eric Hodek <EHodek@ramboll.com>
Sent: Wednesday, April 24, 2019 10:52 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: More 0000a/MACT HH questions

Hi Karen,

I'm working through applicability determination for a gas plant. The facility is a major source of HAP, so MACT HH would apply to storage vessels and equipment leaks (including compressors). The facility does not have glycol dehydration. Portions of the plant are subject OOOO and others to OOOOa for compressors, equipment leaks for ancillary equipment and storage vessels. I noted that there are exemptions from MACT HH if you control per OOOO [See 40 CFR 63.766(d) and 63.769(b)]. However, under OOOOa, only storage vessels have an overlap exemption under 40 CFR 60.5395a(e). Other equipment subject to MACT HH (equipment leaks, compressors) would also be subject to OOOOa as 40 CFR 60.5385a and 40 CFR 60.5400a make no exemptions for MACT HH. So my question: Are there mutual exemptions for MACT HH and OOOOa that I'm missing or has EPA provided any guidance on this?

Eric

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From: Marsh, Karen <Marsh.Karen@epa.gov>

Sent: Wednesday, November 28, 2018 7:29 AM

To: Eric Hodek <EHodek@ramboll.com>

Subject: RE: OOOOa question

Hi Eric,

OGI mounted on UAVs is already approved provided there is line of sight on every fugitive component. I'm not sure if any facilities have been using this method yet, but we have been letting them know as they ask. They just need to ensure the specific parameters in 60.5397a(c) and (d) are met when mounting the OGI to the UAV.

I hope this helps. Let me know if you have any other questions.

Karen

Karen R. Marsh, PE

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From: Eric Hodek <EHodek@ramboll.com>

Sent: Tuesday, November 27, 2018 4:50 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: OOOOa question

Karen,

Would EPA be willing to consider the using of unmanned aerial vehicles for optical gas imaging to comply with the equipment leak monitoring requirements of OOOOa?

Eric

Eric S. Hodek

Principal

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